

Dear sirs/madams of the Commission,

I have been a licensed radio amateur for 20 years as of October, 16, 2016 under the callsign of KU4GW, a member of the American Radio Relay League (ARRL) since receiving my license, and also have had a appointment by the ARRL as a Official Observer for the FCC Amateur Auxiliary since August 6, 2008 and these are a few things, in my opinion, that require the FCC mitigation to maintain order on the amateur bands and to prevent interference between different modes of operation on the bands. If these rulings are passed as they stand without mitigation by the Commission you are going to cause a lot of grief for the FCC Wireless Telecommunications Bureau and for me as a ARRL Official Observer and a lot of interference complaints and arguments on the airwaves due to interference issues. For those reason I request that you consider the following;

SET ASIDE, IN FCC PART 97 RULES, APPROXIMATELY 100 KHZ AT THE LOWER ENDS OF 80, 40, 20, 15, AND 10 METERS FOR EXISTING CW & NARROW BAND DIGITAL MODES. "Voluntary" band plans issued by a private agency that is not accountable to the public is NOT ACCEPTABLE. It exposes the entire amateur radio service to "arbitrary and capricious" regulation by an organization that can only claim less than 20% of the amateur licensees.

Under generally applicable standards the FCC's current separation of incompatible modes and bandwidths, such as CW/DATA from VOICE/IMAGE should remain in tact! **All three IARU international regulatory bodies already separate ACDS & wide band digital modes from all other emissions and limit the band width.** Japan (the *largest* population of amateur licensees) separates them by LAW, not voluntary band plans.

The Commission should **SET ASIDE A SEPARATE WIDE BAND DIGITAL SEGMENT (ABOVE THE 100 KHZ SEGMENT) FOR ALL "ROBOT" ACDS (REGARDLESS OF BAND WIDTH) AND WIDE BAND DIGITAL.** Make it clear that no unmanned "ROBOT" ACDS operations are legal outside that segment.

NONE OF THESE CHANGES SHOULD AFFECT THE CURRENT VOICE/IMAGE SEGMENTS in frequency assignments or band width specifications.

The Commission needs to **MAKE IT CLEAR THAT WIDE BAND DIGITAL SIGNALS AND ACDS "ROBOTS" SHOULD NOT BE PERMITTED IN THE 160, 30, 17 AND 12 METER BANDS.** These narrow bands are just too small for such activity!

PRACTICES THAT ARE PERFECTLY ACCEPTABLE ON VHF/UHF DO NOT WORK ON HF BANDS! HF has world wide consequences for bad regulation. ACCORDINGLY, NO NEW HF DATA PRIVILEGES SHOULD BE GRANTED AS A "FREE UPGRADE" TO NOVICE OR TECH LICENSEES. There is a way to get more privileges; take an exam to prove you have the qualifications. (This is part of ARRL's RM-11759, a separate rule making, which could be rolled into this one.)

If the FCC mitigation into these generally acceptable standards make them a part of this ruling then I do not think it will cause any problems, but if the Commission choses to allow these rulings to be passed without any further mitigation then you are just asking for a World of problems in the U.S. Amateur Radio Service and thousands of interference complaints, not only from U.S. Amateur radio stations and organizations, but also from amateur radio operations world wide considering the

propagation of radio signals on the HF bands that travel around the Earth when the right band and propagation conditions exist, which they do on a almost daily basis, especially on the 20, 17, and 15 meter bands. Please save yourselves and me a lot of grief in maintaining a interference free operating environment on the HF bands. The ARRL's Amateur Auxiliary to the FCC was created many years ago to assist the FCC in voluntary rule compliance on the amateur radio bands because of the FCC's limited resources in doing so by itself and your mitigation into the assurance that these generally applicable standards for the HF bands are in place with these rulings will make my job and yours much easier if some control is maintained and these rulings desperately need to be passed with these common sense requirements in place! I don't like having to issue a Official Observer Advisory Notice to anyone, but if the Commission does not pass these with the afore mentioned standards in place, I feel that both you and I are going to be overwhelmed with interference complaints. Thanks you in advance for taking these suggestions into consideration and I sincerely hope that you will take them under advisement and pass them as a part of the rulings on RM-11708 and WT 16-239.

My very best regards!

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